



Kizzia Johnson PLLC
1910 Pacific Ave, SUITE 13000
DALLAS, TEXAS 75201
(W) 214.451.0164
(F) 214.451.0165
KJPLLC.COM

Jay Johnson
214.451.0164
jay@kjpllc.com

December 2, 2021

Hon. Denise Cote
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007-1312
via CM/ECF

RE: *Geographic Location Innovations, LLC v. New Deal LLC*
Cause No.: 1:21-cv-08605-DLC
In the United States District Court for the Southern District of New York

Dear Judge Cote:

Plaintiff respectfully requests an extension of time for Plaintiff and Defendant to meet and confer and file a detailed written proposed schedule and continue the Initial Pretrial Conference as ordered by the Court on October 28, 2021 [Doc. 11]. The current deadline to meet and confer and file a detailed written proposed schedule is December 7, 2021, and Plaintiff respectfully requests an extension of forty-five (45) days up and until January 21, 2022. Furthermore, the conference is currently scheduled for December 21, 2021, and Plaintiff respectfully requests a continuance of forty-five (45) days up and until February 4, 2022. Counsel for Plaintiff and Defendant are currently available Friday, February 4, 2022, and the remaining Fridays in February.

This request is not for delay. Defendant's new answer deadline is December 17, 2021, and the parties are discussing an amicable resolution of the matter. On December 2, 2021, counsel for Plaintiff conferred with counsel for Defendant and Defendant does not oppose these requests.

Sincerely,
Kizzia Johnson PLLC

/s/Jay Johnson
Jay Johnson

JB/ak

*The conference is adjourned
to 1/13/22 at 2⁰⁰ pm.
Denise Cote
12/2/21*